

# **EXHIBIT A**

HOWLETT v. CITY OF WARREN, ET AL.

DESHEILA HOWLETT

December 27, 2017

*Prepared for you by*

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December 27, 2017

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<p>1 UNITED STATES DISTRICT COURT 2 EASTERN DISTRICT OF MICHIGAN 3 SOUTHERN DIVISION 4 5 DESHEILA C. HOWLETT, 6 Plaintiff, 7 vs. Case No. 17-11260 8 Hon. Terence G. Berg 9 CITY OF WARREN, COMMISSIONER Mag. R. Steven Whalen 10 JERE GREEN, acting in his 11 individual capacity, LT. LAWRENCE 12 GARDNER, SHAWN JOHNSON, DAWN 13 McLANE, BARBARA BEYER, ANWAR KHAN, 14 DARRIN LABIN, WILLIAM ROSS, KEVIN 15 BARNHILL, PAUL HOUTOS, SCOTT TAYLOR, 16 Defendants. 17 18 19 20 The Videotaped Deposition of DESHEILA HOWLETT, 21 Taken at 333 West Fort Street, 15th Floor, 22 Detroit, Michigan, 23 Commencing at 10:09 a.m., 24 Wednesday, December 27, 2017, 25 Before Alison C. Webster, CSR-6266, RPR.</p>	<p>1 ETHAN VINSON 2 City of Warren, City Attorney's Office 3 One City Square 4 Suite 400 5 Warren, Michigan 48093 6 586.574.4671 7 evinson@cityofwarren.org 8 Co-counsel appearing on behalf of the Defendants. 9 10 ALSO PRESENT: 11 Justin Dloski, Video Technician 12 Mark Simlar 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
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<p>1 APPEARANCES: 2 3 LEONARD MUNGO 4 The Mungo Law Firm, P.L.C. 5 333 West Fort Street 6 Suite 1500 7 Detroit, Michigan 48226 8 313.963.0407 9 mungol16@msn.com 10 Appearing on behalf of the Plaintiff. 11 12 JAMES R. ACHO 13 ELIZABETH RAE-O'DONNELL 14 Cummings, McClorey, Davis &amp; Acho, P.L.C. 15 17436 College Parkway 16 Livonia, Michigan 48152 17 734.261.2400 18 jacho@cmda-law.com 19 erae@cmda-law.com 20 Appearing on behalf of the Defendants. 21 22 23 24 25</p>	<p>1 TABLE OF CONTENTS 2 3 Witness Page 4 DESHEILA HOWLETT 5 6 EXAMINATION 7 BY MR. ACHO: 8 8 EXAMINATION 9 BY MR. MUNGO: 217 10 RE-EXAMINATION 11 BY MR. ACHO: 272 12 13 EXHIBITS 14 15 Exhibit Page 16 17 (Exhibits attached to transcript.) 18 19 DEPOSITION EXHIBIT 1 31 20 DEPOSITION EXHIBIT 2 50 21 DEPOSITION EXHIBIT 3 54 22 DEPOSITION EXHIBIT 4 66 23 DEPOSITION EXHIBIT 5 66 24 DEPOSITION EXHIBIT 6 76 25</p>

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<p>1 regarding Ross?</p> <p>2 MR. ACHO: I -- I don't know offhand,</p> <p>3 but --</p> <p>4 MS. RAE-O'DONNELL: Paragraph 13.</p> <p>5 MR. MUNGO: 13?</p> <p>6 MR. ACHO: Yeah, 13 is where the bulk of</p> <p>7 the claims are.</p> <p>8 MR. MUNGO: It was at 13 what? I should be</p> <p>9 able to find it.</p> <p>10 MS. RAE-O'DONNELL: (C).</p> <p>11 MR. ACHO: (C), yep.</p> <p>12 VIDEO TECHNICIAN: Off the record, 11:17.</p> <p>13 (Off the record at 11:17 a.m.)</p> <p>14 (Back on the record at 11:40 a.m.)</p> <p>15 VIDEO TECHNICIAN: Back on the record,</p> <p>16 11:40.</p> <p>17 BY MR. ACHO:</p> <p>18 Q. When we left off, I had asked you about William Ross</p> <p>19 and we discussed the comment and I asked you if you</p> <p>20 had complained to HR or anyone about Ross, and you</p> <p>21 indicated you had not; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. All right. You did sign acknowledging that you</p> <p>24 received training on departmental rules prohibiting</p> <p>25 discrimination and sexual harassment in the rules of</p>	<p>1 A. Yes.</p> <p>2 Q. Okay. Exhibit 5 is another general order from the</p> <p>3 City of Warren Police Department, and this is dated</p> <p>4 February 28, 2014, and it is titled Rules of Conduct.</p> <p>5 You received and reviewed this policy, as well;</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. These are the conduct standards and the code of ethics</p> <p>9 for the City of Warren Police Department; correct?</p> <p>10 A. Yes.</p> <p>11 Q. On page 5, it discusses conduct toward fellow</p> <p>12 employees, and it discusses, under subsection 4,</p> <p>13 accountability, responsibility and discipline. And it</p> <p>14 states, under section 4, "that any complaints against</p> <p>15 any member of the department are to be reported to a</p> <p>16 supervisor"; correct?</p> <p>17 A. Yes.</p> <p>18 Q. All right. You signed for this order, as well; is</p> <p>19 that right?</p> <p>20 A. Yes.</p> <p>21 Q. All right. And if we look, going back to Exhibit 2,</p> <p>22 which is your personnel file on page 4, there is a</p> <p>23 page where you signed and initialed for the receipt</p> <p>24 and review and training on numerous departmental</p> <p>25 policies. Do you see that?</p>
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<p>1 conduct and procedure; correct?</p> <p>2 A. Yes.</p> <p>3 MR. ACHO: Okay. I'm going to mark two</p> <p>4 orders as Exhibits 4 and 5.</p> <p>5 MARKED FOR IDENTIFICATION:</p> <p>6 DEPOSITION EXHIBIT 4-5</p> <p>7 11:40 a.m.</p> <p>8 MR. MUNGO: Was the Complaint 3, Counsel?</p> <p>9 MR. ACHO: Good question. Yes.</p> <p>10 BY MR. ACHO:</p> <p>11 Q. Exhibit 4 is an Order dated January 10, 2003. It's a</p> <p>12 City of Warren Police Department Order on</p> <p>13 Discrimination and Sexual Harassment and the</p> <p>14 Prohibition of same, do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And you received this as part of your training;</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. You were advised that the City of Warren does not</p> <p>20 tolerate or condone harassment of any sort or</p> <p>21 discriminatory behavior of any sort; correct?</p> <p>22 A. Yes.</p> <p>23 Q. You were advised that, as an employee, you had a</p> <p>24 responsibility to report these matters to management's</p> <p>25 attention; correct?</p>	<p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 MR. MUNGO: I'm sorry, Counsel, what page</p> <p>4 was that?</p> <p>5 MR. ACHO: That was page 4 of the personnel</p> <p>6 file.</p> <p>7 MR. MUNGO: Of the personnel file. You</p> <p>8 haven't marked that as an exhibit?</p> <p>9 MR. ACHO: I did.</p> <p>10 MR. MUNGO: Which one?</p> <p>11 MR. ACHO: Exhibit 2.</p> <p>12 MR. MUNGO: Exhibit 2. And that was</p> <p>13 page 5, you said?</p> <p>14 MR. ACHO: Page 4.</p> <p>15 MR. MUNGO: Did you see that?</p> <p>16 THE WITNESS: Uh-huh.</p> <p>17 BY MR. ACHO:</p> <p>18 Q. All right. So you were passed on from step 1 of the</p> <p>19 FTO program to step 2; correct?</p> <p>20 A. Yes.</p> <p>21 Q. And you passed step 2 of the FTO program with no</p> <p>22 issue; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. You're not making any allegations of discrimination at</p> <p>25 the step 2 level of the FTO, are you?</p>



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<p style="text-align: right;">Page 73</p> <p>1 right?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Okay. But I asked you earlier why you didn't</p> <p>4 complain, and you said that that's not something that</p> <p>5 you do in order to, sort of, protect your job.</p> <p>6 <b>A. Saying that you like a food that you don't like is a</b></p> <p>7 <b>lie, but complaining against other officers is a</b></p> <p>8 <b>different type of offense --</b></p> <p>9 Q. Okay.</p> <p>10 <b>A. -- that suffers a different type of, you know...</b></p> <p>11 Q. Even if it means not complying with orders that say</p> <p>12 you have to report complaints about other officers?</p> <p>13 <b>A. It's just not done.</b></p> <p>14 Q. By you.</p> <p>15 <b>A. By anyone, really.</b></p> <p>16 Q. So nobody -- so it's your testimony that nobody</p> <p>17 complains to HR or supervisors about conduct of other</p> <p>18 officers?</p> <p>19 <b>A. Hardly ever.</b></p> <p>20 Q. And what do you base that on?</p> <p>21 <b>A. Different examples of seeing when a person did</b></p> <p>22 <b>complain, the things that happened to that person. It</b></p> <p>23 <b>just doesn't fare very well. And the times that I've</b></p> <p>24 <b>complained, nothing better. If anything, it just</b></p> <p>25 <b>makes everything worse.</b></p>	<p style="text-align: right;">Page 75</p> <p>1 Q. So he may have intended to leave and go to law school</p> <p>2 anyway; right?</p> <p>3 <b>A. I guess so.</b></p> <p>4 Q. Have you spoken to him?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Okay. Give me some examples, though, where officers</p> <p>7 complained about the treatment of them by fellow</p> <p>8 officers where it didn't go well.</p> <p>9 <b>A. Khan punched another officer in the head and command</b></p> <p>10 <b>had heard about it, and then they asked him if he</b></p> <p>11 <b>wanted to file a complaint, and the officer said no,</b></p> <p>12 <b>because you can't. The general rule is, you don't</b></p> <p>13 <b>complain on one another. So even though the command</b></p> <p>14 <b>knows about it, they don't do anything unless you make</b></p> <p>15 <b>an actual complaint against another officer.</b></p> <p>16 Q. Who was the officer that you allege Officer Khan</p> <p>17 punched?</p> <p>18 <b>A. Twardesky.</b></p> <p>19 Q. Do you know the first name of Officer Twardesky?</p> <p>20 <b>A. Jim.</b></p> <p>21 Q. Okay. Is Officer Twardesky still in the department?</p> <p>22 <b>A. He's a detective, yes.</b></p> <p>23 Q. Do you know the type of relationship that Khan and</p> <p>24 Twardesky had?</p> <p>25 <b>A. He was his FTO at one point.</b></p>
<p style="text-align: right;">Page 74</p> <p>1 Q. Okay. Well, give me some examples of officers who</p> <p>2 have complained to supervisors or HR about other</p> <p>3 officers' behavior and it didn't fare well for them.</p> <p>4 <b>A. John Adams.</b></p> <p>5 Q. Okay. Who's John Adams?</p> <p>6 <b>A. He was a police officer with the City of Warren.</b></p> <p>7 Q. Okay. And is he still?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Okay. Tell me about what you know about</p> <p>10 Officer Adams.</p> <p>11 <b>A. His issue or complaint was about officers being</b></p> <p>12 <b>heavy-handed.</b></p> <p>13 Q. Okay.</p> <p>14 <b>A. And he went into command staff to report it, and then</b></p> <p>15 <b>it got back to the people that he was complaining</b></p> <p>16 <b>about, and then they started calling him a P word and</b></p> <p>17 <b>a snitch and nobody wanted to work with him.</b></p> <p>18 Q. When was this?</p> <p>19 <b>A. I'm not exactly sure.</b></p> <p>20 Q. Was it around the time you were hired? Was it in the</p> <p>21 last couple of years?</p> <p>22 <b>A. He and I were hired on together, so it would have been</b></p> <p>23 <b>quite a few years ago, because he left to go to law</b></p> <p>24 <b>school and stuff like that, so I don't remember</b></p> <p>25 <b>exactly.</b></p>	<p style="text-align: right;">Page 76</p> <p>1 Q. Do you know if they were friends or are friends?</p> <p>2 <b>A. No, I'm not sure.</b></p> <p>3 Q. Okay. I have what I'll mark as Exhibit 6, your</p> <p>4 Answers to Interrogatories.</p> <p>5 MARKED FOR IDENTIFICATION:</p> <p>6 DEPOSITION EXHIBIT 6</p> <p>7 11:52 a.m.</p> <p>8 BY MR. ACHO:</p> <p>9 Q. And without belaboring it and going through all of it,</p> <p>10 I ask -- Ms. O'Donnell and I ask, on a number of</p> <p>11 occasions, to provide any type of written</p> <p>12 documentation or any documentation supporting any of</p> <p>13 your allegations, and your response was that you don't</p> <p>14 possess any documentation; is that right?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Is that because you didn't file any type of complaint?</p> <p>17 <b>A. The only complaints that I recall, I made one with</b></p> <p>18 <b>Mark Simlar regarding a dispatcher and the final</b></p> <p>19 <b>complaint with Barb Beyer.</b></p> <p>20 Q. Okay. The Complaint that you made with Mark Simlar</p> <p>21 regarding a dispatcher, who was that dispatcher?</p> <p>22 <b>A. Dawn.</b></p> <p>23 Q. Dawn?</p> <p>24 <b>A. McLane.</b></p> <p>25 Q. Okay. And when was this complaint to Mark Simlar?</p>

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<p style="text-align: right;">Page 77</p> <p>1 <b>A. I believe 2010 or '11, somewhere in there.</b></p> <p>2 Q. All right. Now, Mr. Simlar is present here today;</p> <p>3 correct?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. What is his position, if you know?</p> <p>6 <b>A. Human resources department.</b></p> <p>7 Q. And you believed he was the individual to complain to?</p> <p>8 <b>A. Well, they had me meet with him, so...</b></p> <p>9 Q. Who's "they"? Let -- I'll tell you what. Let's</p> <p>10 back -- backtrack a little bit. Tell me about the</p> <p>11 incident with Dawn McLane and then take me from there.</p> <p>12 <b>A. I was sent to a man with a gun run, and there was no</b></p> <p>13 <b>information given, no description of the person, no</b></p> <p>14 <b>vehicle, no information regarding the gun, no color of</b></p> <p>15 <b>clothing, and I was in very close proximity to where</b></p> <p>16 <b>that run was, so the odds of me getting there first</b></p> <p>17 <b>were very great. So I waited for her to give more</b></p> <p>18 <b>information, and at the point that no more information</b></p> <p>19 <b>came through, I went on the air and asked for further</b></p> <p>20 <b>information, if there was any, and she was just very</b></p> <p>21 <b>belligerent and never give me any further information.</b></p> <p>22 <b>So after I finished the run, I came into the station</b></p> <p>23 <b>and I decided to make a complaint.</b></p> <p>24 Q. Okay. And what was your complaint, that officer --</p> <p>25 that Dispatcher McLane was difficult or didn't provide</p>	<p style="text-align: right;">Page 79</p> <p>1 correct?</p> <p>2 <b>A. In the fact that you're not given the proper</b></p> <p>3 <b>information and that it shows that when I did complain</b></p> <p>4 <b>nothing happened, so...</b></p> <p>5 Q. How do you know nothing happened?</p> <p>6 <b>A. Because they usually type it up on a memo and they put</b></p> <p>7 <b>it in an email to everyone of discipline that's been</b></p> <p>8 <b>given.</b></p> <p>9 Q. So other officers that have been disciplined, that</p> <p>10 memo is disseminated to everybody in the department?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Can you give some examples of officers that have been</p> <p>13 disciplined where it was disseminated to everybody?</p> <p>14 <b>A. If people get days off or get suspended or something</b></p> <p>15 <b>like that, they'll put an email out.</b></p> <p>16 Q. For officers?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Can you give some examples?</p> <p>19 <b>A. So many.</b></p> <p>20 Q. There's "so many" because Warren takes a lot of</p> <p>21 disciplinary action against officers?</p> <p>22 <b>A. From time to time.</b></p> <p>23 Q. If things are reported, they'll take action; right?</p> <p>24 <b>A. From time to time. It depends on who it is.</b></p> <p>25 Q. Do you think they're selective?</p>
<p style="text-align: right;">Page 78</p> <p>1 more information?</p> <p>2 <b>A. On a serious run, yes.</b></p> <p>3 Q. Okay. Since you are familiar with the police culture,</p> <p>4 would you agree with me that sometimes things get</p> <p>5 heated between dispatchers and officers?</p> <p>6 <b>A. Sure.</b></p> <p>7 Q. Dispatchers have a highly, highly stressful job?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Especially in a city the size of Warren.</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Okay. What did Mr. Simlar do with the complaint</p> <p>12 regarding Ms. McLane?</p> <p>13 <b>A. I have no idea.</b></p> <p>14 Q. Okay. Who was it that told you to meet with</p> <p>15 Mr. Simlar? Who did you complain to initially?</p> <p>16 <b>A. It would have been whoever was in the office at that</b></p> <p>17 <b>time, but I don't -- I don't remember.</b></p> <p>18 Q. All right. But you didn't have any reason to believe</p> <p>19 that Ms. McLane withheld information from you because</p> <p>20 of your race or your gender, did you?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Okay. It was just butting heads, a personality</p> <p>23 conflict with another employee; right?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. I mean, it's nothing that gives rise to your lawsuit;</p>	<p style="text-align: right;">Page 80</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. And what is the selectivity based on?</p> <p>3 <b>A. If you are on special teams, special assignments, like</b></p> <p>4 <b>the special response team, things like that. If</b></p> <p>5 <b>you're in different units, the rules don't apply to</b></p> <p>6 <b>everyone the same.</b></p> <p>7 Q. Were you ever on any special units?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Okay. Getting back to Dawn McLane, you don't know for</p> <p>10 certain that she did or did not receive any</p> <p>11 disciplinary action; correct?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Also, when I asked you about how do you know when</p> <p>14 officers were disciplined, you said, when police</p> <p>15 officers received discipline, there's usually a memo</p> <p>16 and it goes out to the department. But Dawn McLane is</p> <p>17 not a police officer; correct?</p> <p>18 <b>A. Correct.</b></p> <p>19 THE WITNESS: There it goes.</p> <p>20 MR. MUNGO: That's okay. That's okay. No</p> <p>21 problem, no problem, no problem. No biggie. No</p> <p>22 problem. Got it. We got it. No, no, no, I got it. I</p> <p>23 got it. I got it. It's okay.</p> <p>24 MR. ACHO: All right. No biggie because</p> <p>25 your copies are good, so we've got them in.</p>



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<p style="text-align: right;">Page 173</p> <p>1 <b>A. Yes.</b>  2 Q. More than three years?  3 <b>A. Yes.</b>  4 Q. Did you ever go to HR or any supervisor and complain  5 about Jason Booms' comments?  6 <b>A. No.</b>  7 Q. Barbara Beyer. Barbara Beyer is no longer a defendant  8 in this lawsuit; is that correct?  9 MR. MUNGO: That's correct.  10 BY MR. ACHO:  11 Q. Okay. Do you know why that is?  12 <b>A. No.</b>  13 Q. You initially sued her; correct?  14 <b>A. She was named as a defendant, yes.</b>  15 Q. Right. And why did you name Barbara Beyer as a  16 defendant?  17 <b>A. Because she was screaming, that nigger, that nigger,</b>  18 <b>at me.</b>  19 Q. At you, or out loud within your earshot?  20 <b>A. Out loud within my earshot.</b>  21 Q. All right. Can you tell me the context of that  22 situation, why the woman used that word?  23 <b>A. I was going around the corner to ask her a question.</b>  24 <b>I had come back from vacation and I couldn't find</b>  25 <b>certain documents, so I didn't know if they ever log</b></p>	<p style="text-align: right;">Page 175</p> <p>1 <b>A. She was talking about another black man, though.</b>  2 Q. Okay.  3 <b>A. Appropriate?</b>  4 Q. I'm going to ask you the questions.  5 <b>A. Okay. Go ahead.</b>  6 Q. You guys were friends. Did you have lunch together?  7 <b>A. Uh-huh, yes.</b>  8 Q. Did you make a complaint to HR or anyone else about  9 Barb Beyer?  10 <b>A. I talked to Sergeant Mills and Matt Nichols about it.</b>  11 Q. Okay. And was a complaint lodged? There was a formal  12 complaint against Barb Beyer; correct?  13 <b>A. Yes.</b>  14 Q. Who is no longer a defendant in this case; correct?  15 <b>A. Based on you telling me that today, yes.</b>  16 Q. Based on your attorney confirming that she is not;  17 correct?  18 <b>A. Okay. Yes.</b>  19 Q. But you don't know why she is not.  20 <b>A. No.</b>  21 Q. Okay. Do you know what happened to Ms. Beyer as a  22 result of the complaint?  23 <b>A. No.</b>  24 Q. Do you know that she was given discipline action?  25 <b>A. No.</b></p>
<p style="text-align: right;">Page 174</p> <p>1 things or do they just randomly place them on a desk.  2 So when I turned the corner, she looked at me and she  3 started screaming, that nigger, that nigger.  4 So being in police mode, I decide to look  5 out the glass because I'm assuming there's some type  6 of threat or something that needs to be addressed. I  7 look out the glass and there's no one standing there.  8 Her office, besides it being encased in glass, there's  9 a glass door. I look out of the glass door, there's  10 nobody in the hallway. So whatever she's talking  11 about is not current for her level of agitation or  12 whatever you want to call it.  13 So when she screams out, that nigger, that  14 nigger would have killed me if the glass wasn't there,  15 it threw me, so I kind of fell back. She grabbed a  16 hold of my arm so I don't, like, fall all the way  17 back, and then she goes, I didn't mean you, not you.  18 I was going to tell you the story anyway.  19 Q. And did she tell you the story?  20 <b>A. Yeah.</b>  21 Q. Okay. Because you and Barb Beyer were friends; right?  22 <b>A. I thought. We were friendly. We would bring each</b>  23 <b>other lunch sometimes and go out.</b>  24 Q. Right. So she wasn't using that word against you, was  25 she?</p>	<p style="text-align: right;">Page 176</p> <p>1 Q. You've never been told that?  2 <b>A. No.</b>  3 Q. If she was, in fact, handed disciplinary action, you  4 would agree that would be the right approach for the  5 City of Warren Police Department to take for her using  6 those epithets.  7 <b>A. Yes.</b>  8 Q. 13(f), you discuss Officer Roland Bell. You know  9 Officer Roland Bell?  10 <b>A. Yes.</b>  11 Q. You make allegations that, "He asked plaintiff why she  12 was walking gingerly after having a fibroid removed,  13 and when plaintiff explained to her" -- "when  14 plaintiff" -- strike that, let me start over.  15 "Roland Bell, white male, asked plaintiff  16 why she was walking gingerly after having a fibroid  17 removed, and when plaintiff explained, he told her,  18 'no, it's because of all that big, black dick in  19 you.'"  20 Do you see that?  21 <b>A. Yes, sir.</b>  22 Q. Did he make that comment?  23 <b>A. Yes.</b>  24 Q. And he made that to you in a total joking fashion, did  25 he not?</p>

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<p style="text-align: right;">Page 177</p> <p>1 <b>A. No.</b></p> <p>2 Q. You and Roland Bell would joke with each other; right?</p> <p>3 <b>A. Roland Bell would bring me diapers for my Goddaughter.</b></p> <p>4 Q. Right. For -- in fact, he brought you diapers and</p> <p>5 formula when he thought you were adopting that child,</p> <p>6 did he not?</p> <p>7 <b>A. Yes, and I also gave him money when his son died.</b></p> <p>8 Q. Five to ten times, though, he and his wife brought you</p> <p>9 diapers and formula, did they not?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. And Roland Bell coaches an all-black football team,</p> <p>12 doesn't he?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. So this isn't like a white guy that dislikes black</p> <p>15 people, is it?</p> <p>16 <b>A. It comes from the people that are closest to you. The</b></p> <p>17 <b>people who you talk to are the ones that are doing</b></p> <p>18 <b>these things.</b></p> <p>19 Q. But he was joking around with you, wasn't he?</p> <p>20 MR. MUNGO: Objection, assumes a fact not</p> <p>21 in evidence.</p> <p>22 BY MR. ACHO:</p> <p>23 Q. Let me ask you this: This guy brings diapers and</p> <p>24 formula to your house five to ten times.</p> <p>25 <b>A. Not to my house, but...</b></p>	<p style="text-align: right;">Page 179</p> <p>1 just driving at, he was just joking with you, wasn't</p> <p>2 he?</p> <p>3 <b>A. Okay.</b></p> <p>4 MR. MUNGO: You -- you -- you --</p> <p>5 <b>A. I said --</b></p> <p>6 MR. MUNGO: He's asking you a question.</p> <p>7 You have to answer.</p> <p>8 <b>A. I said that I was offended and I said that it wasn't a</b></p> <p>9 <b>joke to me.</b></p> <p>10 BY MR. ACHO:</p> <p>11 Q. All right. Did you say, Roland, I'm offended by that?</p> <p>12 <b>A. No.</b></p> <p>13 Q. If you had such a relationship with him, why wouldn't</p> <p>14 you have said that to him if you were, in fact,</p> <p>15 offended?</p> <p>16 <b>A. I had become in habit of being offended and not</b></p> <p>17 <b>addressing it all the time, just allowing things to</b></p> <p>18 <b>kind of roll off so that I wouldn't hinder the few,</b></p> <p>19 <b>you know, occasions that I had to talk with certain</b></p> <p>20 <b>people.</b></p> <p>21 Q. Was anyone else present when Bell allegedly made that</p> <p>22 comment?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Isn't it true that after that comment, you and Bell</p> <p>25 continued on to be friends and joke with each other?</p>
<p style="text-align: right;">Page 178</p> <p>1 Q. I'm sorry, to you. Because the understanding in the</p> <p>2 department was that you were adopting a child. Do you</p> <p>3 believe that his comment to you was anything other</p> <p>4 than a joke?</p> <p>5 <b>A. First and foremost, working in the jail, I needed the</b></p> <p>6 <b>guys to know that I wasn't fully fit, that I was</b></p> <p>7 <b>hurting that day, so I let them know that I had had</b></p> <p>8 <b>the procedure done to make sure that they are extra</b></p> <p>9 <b>aware and pay attention to me on the floor for that</b></p> <p>10 <b>day.</b></p> <p>11 <b>So in saying that, it's a personal female</b></p> <p>12 <b>thing, but if I'm not walking fully brisk and all of</b></p> <p>13 <b>that, so then just leave it at that. Why do I have to</b></p> <p>14 <b>be getting banged up by a big, black dick to be</b></p> <p>15 <b>walking tenderly when I just told you I just had a</b></p> <p>16 <b>medical procedure.</b></p> <p>17 Q. Because he was making a joke, wasn't he?</p> <p>18 <b>A. Okay.</b></p> <p>19 Q. Didn't you and Bell used to joke with each other all</p> <p>20 the time?</p> <p>21 <b>A. Not in an offensive manner.</b></p> <p>22 Q. Didn't you and Bell used to joke with each other all</p> <p>23 the time?</p> <p>24 <b>A. We had a casual relationship.</b></p> <p>25 Q. So you may have interpreted it as offensive, but I'm</p>	<p style="text-align: right;">Page 180</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. And he brought you diapers and formula after that.</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. And you never complained to HR or anyone else about</p> <p>5 this alleged comment from Roland Bell; correct?</p> <p>6 <b>A. No.</b></p> <p>7 Q. He's a good guy, you would agree?</p> <p>8 <b>A. He has his problems, but he's fine.</b></p> <p>9 Q. 13(h), "Defendant Arthur Gill, white male, former</p> <p>10 sergeant, removed plaintiff from her day shift in</p> <p>11 favor of a similarly situated white female officer,</p> <p>12 despite the fact that the white female officer had</p> <p>13 less seniority than plaintiff who was entitled to fill</p> <p>14 that position based upon her higher seniority."</p> <p>15 Now, you say Defendant Arthur Gill is a</p> <p>16 former sergeant. Was he removed as a sergeant or is</p> <p>17 he retired? Do you know?</p> <p>18 <b>A. I don't know his status, if he fired or quit or</b></p> <p>19 <b>retired, but he's just not there at this time.</b></p> <p>20 Q. Okay. And how long ago did Arthur Gill leave the</p> <p>21 Warren Police Department?</p> <p>22 <b>A. It's been a couple of years.</b></p> <p>23 Q. Okay. This specific allegation, can you tell me about</p> <p>24 this incident?</p> <p>25 <b>A. That's when I was hit by the drunk driver.</b></p>



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1 A. Yes.

2 Q. And you're aware that the City has made attempts to

3 become more culturally diverse? Yes?

4 A. I would assume so.

5 Q. In fact, didn't Mayor Fouts publicly acknowledge you

6 at a dinner or luncheon?

7 A. Yes, with explanation.

8 Q. Okay.

9 A. It's like a dog and pony show when you have your one

10 black employee stand up and say, look at how diverse

11 we are. One doesn't equal diversity. So I asked my

12 supervisors if I could not continue to have to go to

13 these things to be announced because it's taking from

14 my work, and they pay the \$25 or 50 or whatever it was

15 for dinner. He had me sitting with senators and such

16 so that when the TV Warren thing is scanning across,

17 I'm in front, and all my coworkers of higher rank and

18 stature are sitting over there snarking and making

19 comments that this is garbage that I'm over here being

20 paraded.

21 Q. The mayor was complimentary of you, though, was he

22 not?

23 A. Yes.

24 MR. ACHO: Give me a couple of minutes.

25 VIDEO TECHNICIAN: Off the record at 3:06.

1 A. No. Lieutenant Gardner told me, like on a Monday,

2 that I needed to move my desk by that Friday, is what

3 happened.

4 Q. Okay. And you were never asked if you were okay with

5 it?

6 A. Only if the problem still had continued, and I stated

7 that it was still continuing because he was still

8 hollering at me, still doing the glare/stare thing and

9 it was still -- he wasn't sharing his work with me.

10 Q. All right. So I asked you about your psychologist and

11 whether or not she feels you're ready to return to

12 work, and you indicated that she has not told you to

13 go back to work; is that right?

14 A. Yes.

15 Q. Has she given you any type of prognosis, like when you

16 might be able to return to work?

17 A. She said I can't go back into policing at all.

18 Q. At all? So what are your plans?

19 A. To start all over, try to go into a different field.

20 I'm probably going to have to get schooling because

21 all my training is in policing.

22 Q. What are you looking for from this lawsuit?

23 A. I would love for each person to be able to walk in

24 that building and literally do a good job and nothing

25 else matter. It not, you know, be about race or

1 (Off the record at 3:06 p.m.)

2 (Back on the record at 3:29 p.m.)

3 VIDEO TECHNICIAN: Back on the record at

4 3:29.

5 BY MR. ACHO:

6 Q. Ms. Howlett, I just want to go back and clear up one

7 area, and that is with Shawn Johnson. When he was

8 moved away from you, and then he was moved back,

9 didn't you have a discussion with Sergeant Mills about

10 the reason that Shawn Johnson was going to be moved

11 back with you?

12 A. No. It was a conversation with Lieutenant Gardner.

13 Q. Okay. But do you remember Lieutenant Gardner asking

14 you if you had a problem with it and you saying you

15 did not?

16 A. No, sir. I specifically asked not to be put back with

17 him. I wasn't going to take the promotion, the

18 position, if we had to sit together. So after I was

19 told that we didn't have to be back together, a couple

20 of weeks later, we were put back together.

21 Q. I understand. But a couple weeks later, wasn't there

22 a reconfiguration of the building where they were

23 remodeling and Sergeant Mills said to you, listen,

24 this remodeling is going on, we've got to put Shawn

25 back with you, do you have a problem with that?

1 gender or any of that, just treat each other like

2 human beings, you know. And so I thought that if I

3 just lasted, endured, in time they would get to know

4 me for me, and it didn't happen and doesn't happen.

5 So, you know, as an officer, you're, like, on a team

6 with people. You need to feel like the team is equal.

7 And so even forgiving everybody over and over and over

8 again for all those things is because trying to

9 survive in it.

10 Q. I appreciate that, but I asked you, what do you want

11 from this lawsuit?

12 A. I want things to get better there, the City of Warren,

13 the department.

14 Q. Okay. And how do you propose that we accomplish that?

15 A. Well, first you have to acknowledge that it's

16 happening.

17 Q. That what is happening?

18 A. The hostile environment, the racist stuff, the gender

19 bias, all these things. How can you fix it if nobody

20 admits to doing it?

21 Q. Okay. So if the City of Warren took some type of

22 proactive measure whereby they say, we're taking this

23 step to ensure that these type of things don't happen,

24 you would be satisfied?

25 A. The City of Warren, from my experience, says what

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<p style="text-align: right;">Page 253</p> <p>1 him being concerned for his safety, working with you?</p> <p>2 <b>A. Us not getting a backup was after he had told me that</b></p> <p>3 <b>that was people's questions of whether it was his</b></p> <p>4 <b>concern.</b></p> <p>5 Q. Okay. Okay. But you had problems with backup before</p> <p>6 you and he were working together; correct?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Remember counsel asked you about the backup and you</p> <p>9 indicated that -- you gave an example where the</p> <p>10 detectives finally showed up?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Okay. It's my understanding from your testimony --</p> <p>13 and maybe I misunderstood -- that after you had</p> <p>14 complained about not having backup, that that problem</p> <p>15 was fixed, that you did get proper backup, timely</p> <p>16 backup; is that true?</p> <p>17 <b>A. I didn't complain.</b></p> <p>18 Q. You didn't complain?</p> <p>19 <b>A. No.</b></p> <p>20 Q. Was the problem ever fixed of you -- in other words,</p> <p>21 did you ever begin to receive proper, timely backup?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Okay. From your testimony earlier, it would appear</p> <p>24 that that's what you were saying, is that ultimately</p> <p>25 you did get proper backup.</p>	<p style="text-align: right;">Page 255</p> <p>1 <b>or hear them coming or they saying, I'm almost out.</b></p> <p>2 <b>But if I was further away from a run, I would start in</b></p> <p>3 <b>the direction of it and then kind of just park a block</b></p> <p>4 <b>or two away, and then when I hear them call out, I</b></p> <p>5 <b>would turn the corner and --</b></p> <p>6 Q. When you hear them call out what, Ms. Howlett?</p> <p>7 <b>A. Police officers call out on the scene.</b></p> <p>8 Q. Okay. So when they got on the scene, that's when you</p> <p>9 went there? Okay. And that delay, could that have</p> <p>10 put the lives of citizens in jeopardy?</p> <p>11 <b>A. Probably.</b></p> <p>12 Q. Probably.</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. Okay. What would you say the delay in time was on</p> <p>15 average? I know it would differ from situation to</p> <p>16 situation, but on average, how much delay in getting</p> <p>17 to a scene would occur?</p> <p>18 <b>A. I don't -- I don't know the exact time. I just know I</b></p> <p>19 <b>would go from going as fast as I could to slowing</b></p> <p>20 <b>down, so so many minutes per run.</b></p> <p>21 Q. Okay. Okay. And your fear of getting there prior to</p> <p>22 backup was what exactly, for the record? Let's be</p> <p>23 clear.</p> <p>24 <b>A. When she told me that they were not coming in the most</b></p> <p>25 <b>direct route to me and that they would come but they</b></p>
<p style="text-align: right;">Page 254</p> <p>1 <b>A. No.</b></p> <p>2 Q. That's not -- yeah, go ahead.</p> <p>3 <b>A. Earlier, I stated that I changed how I did things.</b></p> <p>4 <b>Instead of getting there so promptly or so fast, I</b></p> <p>5 <b>took her advice and I would slow down and make sure</b></p> <p>6 <b>that they're out before me so that I wouldn't be</b></p> <p>7 <b>alone.</b></p> <p>8 Q. Okay. You took whose advice?</p> <p>9 <b>A. Dispatcher Broach, Debbie Broach.</b></p> <p>10 Q. Debbie Broach. What was her advice?</p> <p>11 <b>A. To slow down and not be the first one out so that I</b></p> <p>12 <b>wouldn't be left alone too long.</b></p> <p>13 Q. So you were now out policing and going to calls that</p> <p>14 required you to get there quicker, but you did not</p> <p>15 get -- you did not -- you purposely did not get there</p> <p>16 quicker -- as quick as -- as quickly as you could have</p> <p>17 because of your concern for improper -- concern about</p> <p>18 improper backup?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. Okay. So how often or -- on average, how much delay</p> <p>21 in time would occur in your getting to a particular</p> <p>22 scene that you were dispatched to because of your</p> <p>23 concern for improper backup?</p> <p>24 <b>A. If I was already close to the area, I would just stay</b></p> <p>25 <b>parked for a while until I could kinda hear the sirens</b></p>	<p style="text-align: right;">Page 256</p> <p>1 <b>would go the long way around or they would call out</b></p> <p>2 <b>for lunch, it made me feel like my life was in danger.</b></p> <p>3 Q. Okay. How so, Ms. Howlett? We have to put this in</p> <p>4 the record. And I know you already know, but we need</p> <p>5 to make the record clear. How did you feel your life</p> <p>6 was in danger as a result of going directly to the</p> <p>7 scene when you're dispatched rather than slowing down?</p> <p>8 <b>A. Because if you're being left alone for an unnecessary</b></p> <p>9 <b>amount of time or extra time, the chances of something</b></p> <p>10 <b>happening and you not having assistance is greater.</b></p> <p>11 Q. Okay. What could possibly happen? What are the basic</p> <p>12 tenets of police rules in going to a scene that causes</p> <p>13 you to be concerned about your safety, your wellbeing</p> <p>14 and getting there before backup?</p> <p>15 <b>A. Serious runs, they assign a two-man car, so that's</b></p> <p>16 <b>physically two police officers working in one car.</b></p> <p>17 Q. Yes.</p> <p>18 <b>A. But most of the time I was assigned an individual car.</b></p> <p>19 <b>So what they tried to do, if they don't have a two-man</b></p> <p>20 <b>available, is send two individual cars --</b></p> <p>21 Q. Okay.</p> <p>22 <b>A. -- to handle a serious run.</b></p> <p>23 Q. Okay.</p> <p>24 <b>A. So now if you're in your car and you're there alone,</b></p> <p>25 <b>until the other person comes, you're alone.</b></p>

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<p>1     <b>A. I believe it was April.</b></p> <p>2     Q. April of 2017?</p> <p>3     <b>A. Yes, sir.</b></p> <p>4     Q. And since then, no income at all?</p> <p>5     <b>A. No, sir.</b></p> <p>6     Q. No unemployment?</p> <p>7     <b>A. No.</b></p> <p>8     Q. No workers' comp?</p> <p>9     <b>A. No, sir.</b></p> <p>10    Q. No short-term disability benefits?</p> <p>11    <b>A. No, sir.</b></p> <p>12    Q. Okay. Did you apply for workers' comp?</p> <p>13    <b>A. Yes.</b></p> <p>14    Q. And were you denied?</p> <p>15    <b>A. Yes.</b></p> <p>16    Q. Okay. Did you apply for short-term disability</p> <p>17       benefits?</p> <p>18    <b>A. Yes.</b></p> <p>19    Q. Were you denied?</p> <p>20    <b>A. Yes.</b></p> <p>21    Q. Okay. Is it your understanding that the City of</p> <p>22       Warren has told you that since your injury was work</p> <p>23       related, as counsel here today has also confirmed,</p> <p>24       that because your income -- because your injury was</p> <p>25       work related, that you are not entitled to a</p>	<p>1       understand that that's the City's position, is that</p> <p>2       you're not entitled to short-term disability because</p> <p>3       your injury was work related?</p> <p>4     <b>A. Yes, sir.</b></p> <p>5     Q. Okay. What was your income prior to your leaving on</p> <p>6       sick -- because you were unable to work, what was</p> <p>7       your -- what was your income, annual income, at the</p> <p>8       City of Warren as a police officer?</p> <p>9     <b>A. 89,000.</b></p> <p>10    Q. 89,000. And did you also have benefits?</p> <p>11    <b>A. Medical packages.</b></p> <p>12    Q. Medical package. Do you have any idea what that</p> <p>13       medical package is worth?</p> <p>14    <b>A. Between 12- to 14,000 per employee, I believe.</b></p> <p>15    Q. Per employee, okay. 12- to 14,000, okay.</p> <p>16       So your total including your income -- as</p> <p>17       best you are able to determine, your total income,</p> <p>18       including benefits, with the City of Warren as a</p> <p>19       police officer -- and I think you were serving as a</p> <p>20       sergeant; is that correct?</p> <p>21    <b>A. Detective.</b></p> <p>22    Q. Detective. Was what, if you were to add both your</p> <p>23       annual income coupled with your benefits?</p> <p>24    <b>A. It would have been in the 100,000 marker, 105-,</b></p> <p>25       <b>somewhere in there.</b></p>
<p>1       short-term disability?</p> <p>2     <b>A. Short-term disability. Basically, after I was denied,</b></p> <p>3       <b>it's now under review, I guess. They're looking into.</b></p> <p>4     Q. Okay. Did you hear counsel -- counsel gave me these</p> <p>5       documents today concerning your application --</p> <p>6     <b>A. Okay.</b></p> <p>7     Q. -- for disability and the -- counsel -- general</p> <p>8       counsel for the City of Warren indicated that your</p> <p>9       short-term disability benefits was denied because your</p> <p>10      injury was work related. Did you hear him say that</p> <p>11      today?</p> <p>12    <b>A. Yeah, I heard him say that. That was my first time</b></p> <p>13       <b>hearing it.</b></p> <p>14    Q. I just want to know if you heard it.</p> <p>15    <b>A. Yes.</b></p> <p>16    Q. Okay. All right. And did you agree with that</p> <p>17       position?</p> <p>18    <b>A. That my injury's work related?</b></p> <p>19    Q. That your short-term disability benefits are precluded</p> <p>20       because your injury is work related. Do you agree</p> <p>21       with that assessment?</p> <p>22    <b>A. I don't know what -- what the rules are on when you</b></p> <p>23       <b>get unemployment, short-term versus long-term</b></p> <p>24       <b>disability.</b></p> <p>25    Q. Okay. So you're not familiar with that. But you do</p>	<p>1     Q. \$105,000 a year, okay. And how old are you now?</p> <p>2     <b>A. 44.</b></p> <p>3     Q. 44. And what was the retirement age there at the City</p> <p>4       of Warren? The earliest you could retire?</p> <p>5     <b>A. You have to be -- they do 30 and out there, so -- I</b></p> <p>6       <b>mean, I'm sorry, 25 and out. So 25 plus whatever age</b></p> <p>7       <b>you hired in at. You know, you could be finished</b></p> <p>8       <b>after 25 years.</b></p> <p>9     Q. Okay. And so how many more years would you have had</p> <p>10      to work there at Warren before you were able to</p> <p>11      retire?</p> <p>12    <b>A. 15.</b></p> <p>13    Q. Another 15 years, okay. Okay. And so how have you</p> <p>14       survived without any income up to this point since --</p> <p>15       since April of 2017?</p> <p>16    <b>A. My wife's income.</b></p> <p>17    Q. Okay. And counsel asked you a question earlier, do</p> <p>18       you recall as to your ability -- your ability to</p> <p>19       return to work, and you answered the question -- and I</p> <p>20       don't want to -- I'm not even sure if I can repeat</p> <p>21       your answer exactly, but I want the record to be</p> <p>22       clear. Are you able to return to work?</p> <p>23    <b>A. Not in policing, no.</b></p> <p>24    Q. Not in policing. And why is that, as best as you can</p> <p>25       explain for the record.</p>



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<p style="text-align: right;">Page 269</p> <p>1 A. The way she's explaining to me is like --</p> <p>2 Q. The way "she" who?</p> <p>3 A. My -- the way my doctor is explaining it is because it</p> <p>4 happened --</p> <p>5 Q. Which doctor?</p> <p>6 A. Valivonis. That so many things happened over such a</p> <p>7 period of time from so many different people, that the</p> <p>8 working environment for me has pretty much been</p> <p>9 sullied as far as being in policing where you also</p> <p>10 have to trust, respect one another and know that</p> <p>11 they're going to be there for your safety, so...</p> <p>12 Q. Okay. Did she ever indicate that you were able to</p> <p>13 return to work at all in any profession?</p> <p>14 A. She said probably with six months to a year or more of</p> <p>15 therapy, and if I stayed on medication.</p> <p>16 Q. Have you began to explore alternative careers?</p> <p>17 A. I'm looking into potentially just completely getting</p> <p>18 out of law enforcement and going into, like, interior</p> <p>19 design.</p> <p>20 Q. Okay. Are you working with any particular</p> <p>21 professionals to assist you with that transition?</p> <p>22 A. Yes, I have a work coach.</p> <p>23 Q. Okay. And who is that?</p> <p>24 A. I can't remember his name offhand. Is it Ancell?</p> <p>25 Q. Dr. Ancell?</p>	<p style="text-align: right;">Page 271</p> <p>1 Q. Your friends and family. Have you -- have you -- you</p> <p>2 have complained to them --</p> <p>3 A. Yes, sir.</p> <p>4 Q. -- about that? Okay. And then just for a moment, can</p> <p>5 you tell me, generally, how this has affected your</p> <p>6 life, the quality of your life? What is your life</p> <p>7 like now compared to what it was before you had</p> <p>8 experienced this discrimination and it had culminated</p> <p>9 into this landslide of avalanche of emotional</p> <p>10 disavowal in your life in requiring--</p> <p>11 MR. ACHO: Is there any other colorful</p> <p>12 adjective you wish to editorialize with? I mean,</p> <p>13 goodness, I've been giving --</p> <p>14 BY MR. MUNGO:</p> <p>15 Q. You can -- you can describe the difference. Do you</p> <p>16 need the question again?</p> <p>17 A. No.</p> <p>18 Q. Okay.</p> <p>19 A. When you lose your profession and it's something that</p> <p>20 you've done your entire adult life and my ability to</p> <p>21 provide for my family, you know, and so it's a sense</p> <p>22 of kind of bewilderment because you haven't done</p> <p>23 anything wrong, you. Followed all the rules, you go</p> <p>24 to school, you don't commit a crime, you get into your</p> <p>25 career and it's supposed to end in some type of</p>
<p style="text-align: right;">Page 270</p> <p>1 A. Ancell.</p> <p>2 Q. Okay. He's an occupational therapist or --</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Occupational. Yeah, I think that's the term</p> <p>5 for it. That helps you with selecting a career and</p> <p>6 planning for transition from one career to another.</p> <p>7 And by the way, do you have an expert to</p> <p>8 help you determine what your exact economic losses</p> <p>9 would be as a result of the discriminatory acts of the</p> <p>10 City of Warren and the police department?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. And who would that expert be?</p> <p>13 A. I haven't met with him yet.</p> <p>14 Q. Okay. But you do have an expert?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Had you complained to anyone other than those</p> <p>17 that you've gone on the record here today as having</p> <p>18 complained to who are members of the Warren Police</p> <p>19 Department, whether in command or not, about the</p> <p>20 discriminatory and demeaning treatment that you have</p> <p>21 received while working at the Warren Police</p> <p>22 Department?</p> <p>23 A. Other than the people that I've already mentioned</p> <p>24 related to work, it would just be my friends and</p> <p>25 family.</p>	<p style="text-align: right;">Page 272</p> <p>1 retirement/pension kind of thing. And so to have to,</p> <p>2 first of all, get myself together mentally and</p> <p>3 emotionally and heal from all of this and move</p> <p>4 forward, and then start over back in school trying to</p> <p>5 get into a whole other field, it's just -- it's too</p> <p>6 much to fathom for me, you know.</p> <p>7 And so living in a city that I can no</p> <p>8 longer work for, but I can't even move out of it, to</p> <p>9 feel a peace of mind -- imagine cutting your grass or</p> <p>10 going to the mailbox and always looking over your</p> <p>11 shoulder. It's just -- it's bad. My blinds are</p> <p>12 closed. I don't go out a lot because people are</p> <p>13 continuously like, oh, well, what's next? Well, I'm</p> <p>14 still trying to survive this, you know.</p> <p>15 So my schedule is opposite everybody's.</p> <p>16 You know, I try to be at home on the weekends when my</p> <p>17 neighbor go up north and just be opposite of</p> <p>18 everybody. So pretty much just sedentary and going to</p> <p>19 these appointments for counseling.</p> <p>20 MR. MUNGO: Okay. I think that's it for</p> <p>21 me.</p> <p>22 MR. ACHO: I do have some followup.</p> <p>23 RE-EXAMINATION</p> <p>24 BY MR. ACHO:</p> <p>25 Q. You just said, you know, it's hard because you haven't</p>